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6 **UNITED STATES DISTRICT COURT**
7 **WESTERN DISTRICT OF WASHINGTON**
8 **AT SEATTLE**

9 DEBBIE CHAVES, on behalf of herself and
10 all others similarly situated,

11 Plaintiff,

12 v.

13 AMAZON.COM, INC.,

14 Defendant.

15 Case No.: 2:21-cv-01213-JCC

16 **JOINT STIPULATION EXTENDING**
17 **DEADLINES AND PROVIDING LEAVE**
18 **TO AMEND**

19 Hon. John C. Coughenour

1 Plaintiff Debbie Chaves (“Plaintiff”) and Defendant Amazon.com, Inc. (“Defendant”), by
2 and through their undersigned counsel of record, hereby set forth as follows:

3 WHEREAS on September 7, 2021, Plaintiff filed her putative Class Action Complaint.
4 ECF No. 1;

5 WHEREAS on September 9, 2021, Plaintiff served Defendant with a demand letter
6 pursuant to the Massachusetts Unfair and Deceptive Business Practices Act, Mass. Gen. Laws
7 Ch. 93A, § 9(3);

8 WHEREAS Defendant was served with the Complaint on September 14, 2021. ECF No.
9 4;

10 WHEREAS Defendant’s current deadline to answer or otherwise respond to the
11 Complaint is October 5, 2021;

12 WHEREAS on September 21, 2021, Defendant’s counsel requested additional time to
13 investigate the facts of this matter and to properly respond to the Complaint;

14 WHEREAS Plaintiff’s counsel likewise informed Defendant’s counsel that Plaintiff
15 wished to add a claim for violation of the Massachusetts Unfair and Deceptive Business
16 Practices Act, but without using her amendment as of right under Fed. R. Civ. P. 15(a)(1)(A);

17 WHEREAS Plaintiff’s counsel also stated that they had been retained by additional
18 clients that Plaintiff’s counsel would like to add to the Complaint, but without using an
19 amendment as of right under Fed. R. Civ. P. 15(a)(1)(A);

20 WHEREAS good cause exists;

21 The Parties hereby stipulate as follows:

22 JOINT STIPULATION
23 CASE NO. 2:21-CV-01213-JCC

24 BURSOR & FISHER, P.A.
25 1990 NORTH CALIFORNIA BLVD., SUITE 940
26 WALNUT CREEK, CA 94596

1. Plaintiff shall file the proposed First Amended Complaint attached hereto as
2. **Exhibit 1** within fifteen (15) days of the Court's order granting this stipulation.
3. The First Amended Complaint shall not constitute Plaintiff's amendment as of
4. right under Fed. R. Civ. P. 15(a)(1)(A).

5. 2. Defendant shall answer or otherwise respond to the First Amended Complaint
6. within forty-five (45) days after date the First Amended Complaint is filed.

7. Dated: September 23, 2021

Respectfully submitted,

8. **CARSON NOEL PLLC**

FENWICK & WEST LLP

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By: /s/ Brian D. Buckley
10. Brian D. Buckley
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15. *Attorneys for Defendant*

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18. **BURSOR & FISHER, P.A.**

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23. JOINT STIPULATION
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25. BURSOR & FISHER, P.A.
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WALNUT CREEK, CA 94596

SO ORDERED.

Dated this 23rd day of September 2021.

John C. Coyne, Jr.

John C. Coughenour
UNITED STATES DISTRICT JUDGE

JOINT STIPULATION
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